

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FILED/ACCEPTED

NOV 14 2011

Federal Communications Commission
Office of the Secretary

In the Matter of)

MARITIME COMMUNICATIONS/LAND)
MOBILE, LLC)

EB Docket No. 11-71
File No. EB-09-IH-1751
FRN: 0013587779

Participant in Auction No. 61 and Licensee of Various)
Authorizations in the Wireless Radio Services)
Applicant for Modification of Various Authorizations)
in the Wireless Radio Services;)

Applicant with ENCANA OIL AND GAS (USA), INC.;)
DUQUESNE LIGHT COMPANY; DCP)
MIDSTREAM, LP; JACKSON COUNTY RURAL)
MEMBERSHIP ELECTRIC COOPERATIVE; PUGET)
SOUND ENERGY, INC.; ENBRIDGE ENERGY)
COMPANY, INC.; INTERSTATE POWER AND)
LIGHT COMPANY; WISCONSIN POWER AND)
LIGHT COMPANY; DIXIE ELECTRIC)
MEMBERSHIP CORPORATION, INC.; ATLAS)
PIPELINE—MID CONTINENT, LLC; DENTON)
COUNTY ELECTRIC COOPERATIVE, INC., DBA)
COSERV ELECTRIC; AND SOUTHERN)
CALIFORNIA REGIONAL RAIL AUTHORITY)

Application File Nos.
0004030479, 0004144435,
0004193028, 0004193328,
0004354053, 0004309872,
0004310060, 0004314903,
0004315013, 0004430505,
0004417199, 0004419431,
0004422320, 0004422329,
0004507921, 0004153701,
0004526264, 0004636537,
and 0004604962

For Commission Consent to the Assignment of Various)
Authorizations in the Wireless Radio Services)

**MARITIME'S SUPPLEMENTAL RESPONSES TO THE
ENFORCEMENT BUREAU'S REQUESTS FOR ADMISSION**

Maritime Communications/Land Mobile, LLC ("Maritime") hereby tenders supplemental responses to the Enforcement Bureau's Requests for Admission of Facts and Genuineness of Documents to Maritime Communications/Land Mobile, LLC, filed on May 31, 2011.

Background. Maritime's initial responses to the requests for admission included, in addition to unequivocal admissions and denials, objections or qualified responses to several of 188 enumerated the requests.¹ The Bureau filed a motion to compel more complete responses to

¹ *Maritime's Responses to the Enforcement Bureau's Requests for Admission*, filed June 30, 2011.

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53 of those requests.² Maritime filed a timely opposition on July 18, 2011. On August 1, 2011, Maritime filed a petition for relief under Chapter 11 with the United States Bankruptcy Court for the Northern District of Mississippi, Case No. 11-13463. That same day Maritime requested the presiding judge to stay the hearing proceedings pending Maritime's efforts to pursue relief under the Commission's Second Thursday policy.³

On August 10, 2011, the Presiding Judge entered an order granting the Bureau's motion to compel.⁴ On August 17, 2011, Maritime requested a stay of that ruling pending action on the motion to defer hearing proceedings on Second Thursday grounds.⁵ The Presiding Judge never ruled on that motion, but at the October 25, 2011, prehearing conference and in the order issued the next day, Maritime was directed to provide complete response by November 4, 2011.⁶ This document is being served in compliance with that order.

Supplemental Responses. The Bureau's motion to compel sought more complete responses to Request Nos. 2-3, 7-15, 28-29, 31-33, 35-38, 60-65, 104-114, 115-117, 175-181 and 183-188. Maritime here offers the following responses.

1-2.	Admitted.
7-15.	Admitted.
28-29.	Admitted.
31-33.	Admitted.
35-38.	Admitted.

² *Enforcement Bureau's Motion to Compel Maritime to Properly Respond to Requests for Admission of Facts and Genuineness of Documents*, filed July 7, 2011.

³ *Maritime's Motion to Defer all Procedural Dates*, filed August 1, 2011.

⁴ *Memorandum Opinion and Order* (FCC 11M-23; rel. Aug. 10, 2011).

⁵ *Maritime's Motion to Stay Memorandum Opinion and Order* (FCC 11M-23), filed August 17, 2011.

⁶ *Order* (FCC 11M-31; rel. Oct. 26, 2011).

60-65. Admitted.

104-116. Admitted.

117. Admitted that no such formal amendment was filed. Denied that MCT Corp. was an affiliate of Donald DePriest.

175-181. Admitted that these documents appear to be accurate representations of the information electronically filed by Maritime.

183-188. Admitted.

Respectfully Submitted,



Robert J. Keller
Counsel for Maritime Communications/
Land Mobile, LLC

Email: rjk@telcomlaw.com
Telephone: 202.656.8490
Facsimile: 202.223.2121

Law Offices of Robert J. Keller, P.C.
PO Box 33428
Washington, D.C. 20033

Dated: November 14, 2010

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of November, 2011, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

Pamela A. Kane, Deputy Chief
Brian Carter, Esquire
Investigations and Hearing Division
Enforcement Bureau
Federal Communications Commission
445 Twelfth Street, N.W. – Room 4-C330
Washington, D.C. 20554

Jack Richards, Esquire
Wesley K. Wright, Esquire
Keller and Heckman LLP
1001 G Street NW
Suite 500 West
Washington, D.C. 20001

Robert J. Miller, Esquire
Gardere Wynne Sewell LLP
1601 Elm Street
Suite 3000
Dallas, Texas 75201

Albert J. Catalano, Esquire
Matthew J. Plache, Esquire
Catalano & Plache, PLLC
3221 M Street, N.W.
Washington, D.C. 20007

Howard Liberman, Esquire
Patrick McFadden, Esquire
DrinkerBiddle
1500 K Street, N.W.
Washington, DC 20005-1209

Harry F. Cole, Esquire
Christine Goepp, Esquire
Fletcher, Heald & Hildreth, P.L.C.
1300 N Street – Eleventh Floor
Arlington, Virginia 22209

Charles A. Zdebski, Esquire
Eric J. Schwalb, Esquire
Eckert Seamans Cherin & Mellott, LLC
1717 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Kurt E. Desoto, Esquire
Wiley Rein LLP
1776 K Street, N.W.
Washington, D.C. 20006

Jeffrey L. Sheldon, Esquire
Fish & Richardson, P.C.
1425 K Street, N.W.
Eleventh Floor
Washington, D.C. 20005



Robert J. Keller
Counsel for Maritime
Communications/Land Mobile, LLC